

Department of
Environmental
ProtectionGENERAL
INSPECTION REPORTBureau of
Land Recycling
and Waste Management

Type of Inspection	WM Identification Number	Entry Time/Date	Exit Time/Date
Follow-up	PAD987289238	1/31/02	
Facility/Incident Name and Location		Municipality	
Henry Miller Spring		Sharpsburg Boro	
Ali Street Pittsburgh, PA 15215		County	
		Allegheny	
Name, Address or Responsible Official Mr. David Jablonowski		Title	
Rocco Volpe Barber Spring		Telephone	Interviewed?
		412 782-7330	X YES NO

On 1/31/02, a follow-up inspection occurred at this facility. Present were Rocco Volpe (Barber Spring), who is in charge of disposal of the paint waste at Henry Miller Spring, and Judy Neelan from the Department. According to Mr. Volpe, the paint waste, left at the Henry Miller Spring facility, was removed yesterday as arranged by WMMC. Manifest No. PAG312698 shows that 7 drums (385 gallons) of waste (D001, D035, F003, F005) was removed by Dart Trucking and destined for Chemtron Corporation. Also according to Mr. Volpe, and to a brief inspection, there are no other wastes onsite. This facility is now closed.

Violations: none noted

Sample Collected? — YES — NO	Sample Numbers	Analysis	
Inspector Name Judy Neelan	Inspector Signature <i>Judy Neelan</i>	Headquarters SW Region - Pittsburgh	Date <i>1/31/02</i> Telephone 412 442-5802
Person Interviewed Name	Signature of Person Interviewed	Title	Date Telephone

This document is official notification that a representative of the Department of Environmental Protection inspected the above-mentioned facility. The findings of the inspection are shown above and on any attached pages. Violations discovered as a result of this inspection are indicated. Violations may also be discovered upon examination of the results of laboratory analyses, review of pertinent documents and further investigation. Notification will be forthcoming if such violations are discovered.

1. EPA ID NUMBER		P A D 9 8 7 2 8 9 2 3									
2. FACILITY NAME <u>Henry Miller Spring MFG Co</u>											
3. NOTIFICATION DATE <u>9/27/00</u>						4. SOURCE (circle one): N A <u>(S)</u> E					
WASTE ACTIVITY	5. TYPE (New Status) (circle one)	6. RCRA REGULATORY STATUS (circle one)	7. STATUS DESCRIPTION (circle one)								
GENERATOR (Current Status) 1 LQG <u>2 SQG</u> 3 CESQG 4 Other _____	1 LQG 2 SQG 3 CESQG <u>(N)</u> Not a generator, verified Blank Unverified	R RCRA Regulated P Pending A Regulated under another ID Number <u>(N)</u> Not RCRA Regulated (closed, non-handler)	1 Conditionally Exempt Small Quantity Generator 2 Definitionally excluded waste 3 Delisted wastes 4 One-time generator 5 Periodic generator 6 No longer generating hazardous waste, still in business <u>(7*)</u> No longer generating hazardous waste, no longer in business 8* Never generated hazardous waste 9 ID number to transport no hazardous waste 10 Regulated under another number (*most commonly used)								

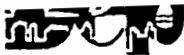
STATUS CHANGE DETERMINED BY:

<input checked="" type="checkbox"/> Inspection Report	<input type="checkbox"/> Revised Notification
<input type="checkbox"/> Revised Notification from the Facility	<input type="checkbox"/> EPA Clean Closure Certificate
<input type="checkbox"/> State Documentation Certifying Clean Closure	<input type="checkbox"/> Affidavit from the Facility
<input type="checkbox"/> Affidavit from the State	<input type="checkbox"/> Biennial Report
<input type="checkbox"/> Documentation not Required	<input type="checkbox"/> Other (explain below)

BAH/SG(2-7-01)

EPA/BAH Use Only

Date to Date Entry _____
 Batch Number 24
 Date QA'd BAH/12/31



HAZARDOUS WASTE INSPECTION REPORT

☐ GENERATOR

☐ S Q GENERATOR

Company name Henry Miller Spring I.D. Number PAD 98728923
Site Address P.O. Box 7826
County Allegheny Municipality Sharpsburg Zip 15215
Name of Inspector Judy Neelan
Name & Title of Responsible Official Mr. David Sahlonowski 412 782-73
Person Interviewed George Zentkovich Telephone () _____
Mailing Address (if different from above) _____
Amount of Hazardous Waste Generated per Month: 0 Pounds _____ Kgs _____

1. Site Characterization:

STORAGE: ☐ Container ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad Other _____

PBR: ☐ Neutralization/WWTP ☐ Reclaim Other _____

GENERATOR TREATMENT ☐ Containers ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad

2. Universal Waste: ☐ Large Quantity Handler ☐ Small Quantity Handler

Universal Waste Types _____

3. Hazardous Waste Transporters:

Transporter Name _____ License Number _____

Transporter Name _____ License Number _____

Transporter Name _____ License Number _____

4. Types of hazardous waste generated and destination facility (location & type).

Waste Code	Waste Description	Destination Facility

This facility is closed

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS

Site Name _____ ID Number _____ Date _____

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NO.
				Hazardous waste determination performed on all waste streams	262a.10	262.11	H001
				Identification Number	262a.10	262.12	H002
				Authorized transporters only	262a.10	262.12(c)	H003
				Subsequent notification requirements met	262a.12(b)		H004
				Proper manifest used	262a.10	262.21	H005
				Manifests filled out correctly and completely	262a.20		H006
				Manifests signed and routed properly	262a.23(a)	262.23	H007
				Generator waste accumulated on site for 90 days or less	262a.10	262.34(a)	H008
				SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262a.10	262.34(e)(f)	H009
				SQG waste accumulated on-site never exceeds 6000 kg	262a.10	262.34(e)(f)	H010
				Satellite accumulation requirements complied with	262a.10	262.34(c)	H011
				Personnel training program per 265.16 complied with	262a.10	262.34(a)(4) 262.34(d)	H012
				Manifest exception and biennial reports retained for 3 years	262a.10	262.40(a)(b)	H013
				Specified records retained for three years	262a.10	262.40(c)	H014
				Biennial reports submitted to the Department (LQG only)	262a.41	262.41	H015
				Exception reporting procedures followed	262a.42	262.42	H016
				Spill reporting procedures followed	262a.10	262.34(d)	H017
				PPC plan developed and implemented	262a.10	262.34(a)	H018
				Special requirements followed for international shipments	262a.10	262.50 262.60	H019
				Source reduction strategy prepared and available (LQG only)	262a.100		H020
				Excluded waste complies with exclusionary requirements	261a.4	261.4	H021

HAZARDOUS WASTE INSPECTION REPORT

GENERATORS -- SMALL QUANTITY GENERATORS

FACILITY SPECIFICS

Site Name _____ ID Number _____ Date _____

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.
				CONTAINERS (Subchapter I)			
				Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I	262a.10	262.34	H025
				Containers of hazardous waste in good condition	265a.1	265.171	H026
				Containers and stored waste compatible	265a.1	265.172	H027
				Containers kept closed except during addition or removal of wastes	265a.1	265.173(a)	H028
				Containers managed to prevent leaks	265a.1	265.173(b)	H029
				Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment	265a.173		H030
				Container storage areas inspected at least weekly	265a.1	265.174	H031
				Special requirements for ignitable or reactive and incompatible waste complied with	265a.1	265.176-177	H032
				Proper containment and collection systems in place	265a.179		H033
				Air emission standards complied with (AA, BB, CC)	265a.1	265.178	H034
				Containers clearly marked with accumulation date and visible for inspection	262a.10	262.34(a)(2)	H035
				Containers labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H036
				Containers labeled accurately identify contents	SWMA 6018.403(b) (2)		H037

INSPECTION REPORT COMMENTS

Date of Inspection 9/27/00 Identification Number PAD 987289238
Company/Facility/Site Name Henry Miller Spring

On 9/27/00, an inspection occurred at this facility. Fred Desorchia & I were met by George Zentkovich, one of two employees left at the facility which is now closed.

Mr. Zentkovich stated that the facility has been closed since January of this year and that the manufacturing operation was moved across the river to Barber Spring Co.

When asked if there were any wastes left onsite Mr. Zentkovich stated that there were three drums of oil, some left over tectyl in the equipment and five tanks of oil-based paint. It is not yet known whether the paint will be re-used or disposed.

During a follow-up call with Mr. Sabinowski, he stated that the oil will be taken by Fred's oil and that the tanks of paint waste will be disposed before the end of the year. Mr. Sabinowski stated that he will send disposal receipts for wastes that have been or will be shipped offsite.

No violations were noted. Questions may be addressed to me at 412 442-5802.

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Person interviewed (signature) Sent to Mr. Sabinowski Date 9/27/00
Inspector (signature) J. Neelan Date _____

INSPECTION REPORT COMMENTS

Date of Inspection 9/29, 10/12, 10/13/94 Identification Number newly issued tank
Company/Facility/Site Name Henry Miller Spring & Mfg. Co

Comments on Henry Miller Spring and Manufacturing Company
Sharpsburg, PA 15215

On 9/29/94, a residual waste inspection was conducted at the above facility. It was determined that the company had generated, over a period of approximately five years, somewhere between 250-400 drums of what may have been hazardous waste. The wastestream in question was generated by mixing two potentially hazardous wastestreams together, namely a coating and paint waste. After most of this waste was processed (see attached report), the resulting solid portion was determined to be hazardous. The semi-liquid portion, which has been going for processing and reclamation to a company called Oil Service in Pittsburgh, is currently being tested. Appropriate action will be taken when results of these tests are known.

The waste codes listed for this waste were D001, F003, F005, and D035. There is some question, however, whether the F003 and F005 listing are accurate as the facility uses dip tanks for painting and does not clean them out with solvents.

The company does not typically generate large quantities of hazardous waste. The disposal of this mixed wastestream is considered to be a one time event. The wastestream will not, according to Mr. Sarmacy, be generated in the future. I have advised the facility that they will have to renotify as a small quantity generator when they fall within the appropriate generation limits.

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Person interviewed (signature) _____ Date _____

Inspector (signature) Judy Nelson Date 10/21/94

Page ____ of ____

Generator Name _____

Date _____

INSPECTION REPORT - RESIDUAL WASTE GENERATOR

1 = No Violation Observed

2 = Not Applicable

3 = Not Determined

4 = Non-Compliance

Chapter Citation 25 Pa Code	Requirement GENERAL PROVISIONS	Status				Line Number
		1	2	3	4	
287.6	Designated facility: valid permit? Permit Number (PA) _____	✓				3001
287.52(a)	Biennial report submitted by March 1 of each odd numbered year.	✓				3002
287.53	Written source reduction strategy on file and in effect.	✓				3003
287.53(b)	Waste reduction strategy covers all waste streams.				✓	3004
287.53(c)	Reduction strategy updated every five years or when waste or manufacturing process changes.			✓		3005
287.54	Waste analysis performed: copy on file.	✓				3006
287.54(b, f)	Annual analysis or certification of waste submitted to Department and designated facility.			✓		3007
287.55	Small quantity generator record keeping requirements.		✓			3008
287.101(a)	Operation of disposal or processing facility without a permit.				✓	3009
	STORAGE REQUIREMENTS					
299.111(1)	Residual waste not mixed with hazardous waste.			✓		3010
299.111(2)	Waste stored as not to create a safety risk.	✓				3011
299.111(3)	Residual waste not mixed with special handling waste.		✓			3012
299.111(4)	Waste not blown or otherwise deposited outside storage area.	✓				3013
299.112(c)	Storage area inspected; records available.				✓	3014
299.113(a)	All waste stored less than one year.				✓	3015
299.114(a)	Equipment maintained in operable condition.		✓			3016
299.114(c)	Equipment cleaning frequencies maintained.		✓			3017
299.115	Vectors controlled and public nuisances prevented.	✓				3018
299.116(a)(b)	Run on, runoff minimized; storage areas managed in accordance with Clean Streams Law.	✓				3019
299.116(c)	Waste stored to prevent groundwater degradation.	✓				3020
299.121	Sufficient number of properly constructed storage containers.	✓				3021
299.122	Storage tank design standards.		✓			3022
299.112(d)	No putrescible waste or liquid waste stored in piles.		✓			3023
299.131	Waste storage pile area properly designed, constructed and maintained.		✓			3024
299.132	Storage pad or liner system properly designed and maintained.		✓			3025
299.133	Proper design and maintenance of leachate and runoff control systems.		✓			3026
299.151	Proper storage and containment of incinerator ash residue.		✓			3027
299.152	Proper storage and containment of friable asbestos containing waste.		✓			3028
299.153	Proper storage and containment of coal ash.		✓			3029
299.154	Proper storage and containment of PCB containing waste material.		✓			3030

INSPECTION REPORT COMMENTS

Date of Inspection 9/29, 10/12, and 10/18/94 Identification Number
Company/Facility/Site Name Henry Miller Spring and Mfg. Co.

On 9/29/94, a residual waste inspection was conducted at the above facility. Present for the inspection were Donald Melampy, President and Joe Surmacy, Maintenance Supervisor, from the facility and Judy Neelan from the Department. A return visit occurred on 10/12/94 and 10/18/94. Present for these inspections were J. Surmacy and J. Neelan.

The facility manufactures hot wound coil springs. Production begins with purchased carbon steel rods having various diameters. Basically, these rods are cut to a desired length, tapered on the ends, and wound into a coil. Ends of the coil are then ground to produce a flat surface and the coil is sprayed with a protective coating, or painted, to prevent rust formation. Several of the processes require heating and quenching, and shot blasting is done to remove surface impurities. Wastes generated include the following:

Wastestream

Disposal

scrap steel
scale
baghouse dust
steel dust
quench tank sludge

grinding dust
paint conveyor residue
oil

Riverside Iron and Steel
Riverside Iron and Steel
landfilled - BFI
landfilled - BFI (or sold)
Riverside Iron and Steel
after processing
landfilled - BFI
recycled - Oil Service
Fred's Oil Service

According to Mr. Surmacy, the facility contains nine (9) baghouses, four (4) associated with grinders and five (5) associated with shotblasting operations. If the waste steel shot from blasting is of an intermediate size, it can be sold. If it is too fine to be sold, it is landfilled. Grinding dust is also landfilled as it becomes contaminated with emery dust.

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Inspector (signature) _____ Date _____

INSPECTION REPORT COMMENTS

Date of Inspection _____ Identification Number _____
Company/Facility/Site Name _____

Dry scale results from several processes and is sent as scrap for reuse. According to Mr. Surmacy, the quench tanks produce a sludge which is basically scale and oil. This waste is centrifuged to remove excess oil. The oil is returned to the process and the resulting semi-dry scale is drawn through a furnace to dry the scale so it can be sent for reuse. The drying activity constitutes residual waste processing (by definition) and is a candidate for permit-by-rule. If the facility chooses not to pursue the processing option, they may seek alternatives for disposing of the waste in its oily state.

The facility paints some of their products. Dip tanks are used and are replenished as needed by adding paint or solvent (xylene). Paint is not typically wasted.

Paint conveyor residue consists of a material used to coat finished springs to prevent rusting. The material, called Tectyl 400 CH is purchased from Oil Service and is used until it becomes too thick and waxy to apply. It is then returned to Oil Service for processing and is ultimately sent back to the facility to be used again. According to Mr. Surmacy, the incoming Tectyl has a flashpoint of 106 degrees, but the flashpoint on the Tectyl waste being returned to Oil Service is unknown. According to Mr. Langston, from Oil Service, the material is petrolatum wax combined with Stoddard solvent. I indicated to Mr. Surmacy that a hazardous waste determination will need to be made on the Tectyl which is currently being used and returned to Oil Service.

Another issue of concern involves 250-400 drums of Tectyl waste which were, in the past, mixed with other wastes including paint and assorted debris (trash, oil absorbent granules, etc.) from the facility. These drums have accumulated over the past five years, and Mr. Surmacy has recently been attempting to dispose of these wastes and eliminate this wastestream. The following items regarding disposal of this waste are listed separately for clarity:

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Inspector (signature) _____ Date _____

INSPECTION REPORT COMMENTS

Date of Inspection _____ Identification Number _____
Company/Facility/Site Name _____

- 1) Drums of the Tectyl/paint/debris waste are brought into the building where they are heated to promote handling. The following two wastes are generated:
 - A) Solid materials are removed and collected in drums destined for disposal. This waste has been determined to be hazardous (D001, F003, F005, D035). There are thirty-seven (37) drums of this material currently on site.
 - B) Semi-liquid Tectyl is placed in new drums and covered with plastic. These drums are destined for Oil Service for processing. There has been no hazardous waste determination on this material. As Oil Service already has drums of this same wastestream at its facility, an analysis will be conducted at that site. Mr. Popichak, of PaDER, suggested EPA SW846 method 8240 to test for methyl ethyl ketone, xylene, and toluene in addition to flashpoint.

The facility recently notified for hazardous waste activity and on 10/18/94, Mr. Surmacy stated that the facility received its I.D. number.

Waste Storage Areas

- 1) Outside the paintroom - five (5) drums of paint waste were stored in this area. In a follow-up conversation, Mr. Surmacy stated that these drums actually yielded two (2) drums of waste which are now stored with, and will be disposed with, other hazardous wastes.

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Inspector (signature) _____ Date _____

INSPECTION REPORT COMMENTS

Date of Inspection _____ Identification Number _____
Company/Facility/Site Name _____

2) Fenced front lot (concrete) - The following drums were noted:

- A) Sixteen (16) drums oily absorbent granules from a previous oil spill. These drums are open, unlabeled, and some are leaking. Mr. Surmacy is attempting to dispose of this waste.
- B) Thirty seven (37) drums of hazardous wastes separated from the Tectyl/paint/debris waste mentioned above. Drums were closed and labeled, though not properly contained as required by 25 Pa. Code Section 265.178.

3) Dock area - Thirteen (13) drums of waste oil. Drums are labeled and dated.

Hazardous Waste Violations:

- 1) The facility has not done a proper hazardous waste determination on the currently used Tectyl being returned to Oil Service in violation of 25 Pa. Code Section 262.11. The waste Tectyl is currently being tested for flashpoint. According to Section 261.3^(g) a waste should be considered hazardous until a determination is made that it is not.
- 2) The facility has not done a proper hazardous waste determination on the waste returned to Oil Service that was derived from separating the old Tectyl/paint/debris mixture in violation of Section 262.11. This waste is currently being analyzed for the same constituents found in the solids portion of this wastestream. According to Section 261.3^(g) a waste should be considered hazardous until a determination is made that it is not.
- 3) The facility has been storing hazardous wastes in excess of ninety (90) days without a permit in violation of Section 262.34.

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Inspector (signature) _____ Date _____

INSPECTION REPORT COMMENTS

Date of Inspection _____ Identification Number _____

Company/Facility/Site Name _____

Residual Waste Violations:

- 1) The facility dries oily mill scale from their quench tanks which constitutes processing and therefore requires a permit as required by Act 97 Section 6018.301. This activity could be managed with a permit-by-rule for captive processing as outlined in Section 287.102 (b) if the facility meets the requirements outlined. Otherwise, it must obtain a permit or ship the waste in its oily state.
- 2) While the facility submitted a Biennial Report for 1993, the report does not include all wastestreams in violation of Section 287.52 (5). A new report will be due in 1995 and should include all wastestreams.
- 3) Though the facility has a written source reduction strategy, it is not completed for all wastestreams in violation of Section 287.53 (b). The facility should carefully evaluate all wastestreams to determine if they can be minimized.

Notes and Requests:

The facility has been operating as a large quantity generator of hazardous wastes without meeting the requirements of generators as listed in 25 Pa. Code Chapter 262. However, after the current wastes are disposed, Mr. Surmacy stated that the facility will probably no longer be a large quantity generator. In the event that the facility again begins to generate greater than 2200 lbs. of hazardous waste per month, it should comply with large quantity generator requirements.

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Inspector (signature) _____ Date _____

INSPECTION REPORT COMMENTS

Date of Inspection _____ Identification Number _____

Company/Facility/Site Name _____

The facility may want to consider a co-product determination for some of their wastes. If this option is chosen, the facility would need clear, convincing, and well documented evidence that the material in question is a co-product and not a waste.

When the analyses on the two Tectyl wastes are completed, the facility should forward them to the Department along with disposal receipts for the hazardous wastes currently on site.

Any questions or concerns regarding this report should be directed to me at 442-5802.

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Person interviewed (signature) Sent Date _____

Inspector (signature) Judy Neelan Date 10/21/94

Page ____ of ____

INSPECTION REPORT/DATA ENTRY

Site I.D. # PAD987289238
 Site Name Denny Miller Spring & Duff Co
 Address Ali Street
Pgh, Pa 15215
 Municipality Sharpsburg
 Responsible Official Donald McLampy
 Person Interviewed Joe Surnacy
 Inspector Judy Nelson

Telephone # (412) 782-0700
 Operator Name _____
 Address _____
 County _____
 Title President
 Title Maintenance Superintendent
 Time _____

Date	Inspection Date	Inspection Type	Facility Type	Inspector Number	# Violation
<u>032895</u>	<u>032195</u>	<u>04</u>	<u>07</u>	<u>2581</u>	<u> </u>

Comment E0440u u p

Sample # Low Sample # High

Monitoring Points Sampled

<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>

INSPECTION TYPE

01 Routine	10 Survey
02 Spill response	11 Part B
03 Remedial Action	12 Complaint
04 Follow Up	13 Withdrawn
05 Crit Stage	14 Closure
06 Sample Only	15 Post Closure
07 Permitting	16 Form 4
08 Superfund	17 Form 4 w/sample
09 Ground Water	50 Record Rev
	99 Other

FACILITY TYPE

Municipal	Residual	Hazardous
01 Municipal Waste Landfill	06 Landfill	01 Disposal
02 Construction/Demolition Landfill	07 Demolition	02 Treatment
03 Processing	08 Processing	03 Storage
04 Incinerator	09 Incinerator	04 Transporter
05 Surface Application	10 Surface Application	05 Permit by Rule
	11 Surface Impoundment	06 Generator
	12 Surface Injection Well	07 SQG
	13 Generator	08 RRR
	14 SQG	09 Other
		50 Superfund

INSPECTION REPORT COMMENTS

Date of Inspection 3/21/95 Identification Number PAD 987289236
Company/Facility/Site Name Henry Miller Spinning & Mfg. Co.

On March 21, 1995, a follow-up inspection was conducted at the above facility. Present for the inspection were Joe Surmacy from the facility and Judy Neelan and Gale Campbell from the Department.

The facility shipped the last of its hazardous waste on February 14, 1995 and according to Mr. Surmacy, none has been generated since. All waste drums previously noted on site are gone.

The facility has installed a recovery system for the used Tectyl coating which has been considered hazardous for ignitability (D001). The system consists of the following:

- 1) One tank used as a collection device for Tectyl drippings from the conveyor system.
- 2) One tank used to filter the Tectyl and add new solvent for thinning.
- 3) One tank used to hold reclaimed Tectyl.
- 4) Several drums with mesh lids located at "leaky" parts of the overhead conveyor system. Mr. Surmacy is considering these to be satellite accumulation areas. When these drums are full, they are emptied into the treatment tank.

The facility has notified for a permit-by-rule for this process and has renotified as a small quantity generator. The following comments regarding this process should be noted:

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) _____ Date _____
Inspector (signature) _____ Date _____

INSPECTION REPORT COMMENTS

Date of Inspection _____

Identification Number _____

Company/Facility/Site Name _____

Henry Miller Spring

- 1) As the process is not totally enclosed and continuous (waste is first accumulated, then processed), it is subject to 25 Pa. Code Chapter 266 Subchapter H which deals with onsite reclamation of hazardous wastes. Chapter 266 Subchapter H requires compliance with Chapter 262 (generators) and Chapter 264 Subchapters A-E and I-L (facility standards). Some of these requirements may not apply to this facility and some of the requirements may be waived if convincing evidence is presented as to why they should be. The facility is encouraged to evaluate the appropriate regulations and to call with any questions.
- 2) The waste Tectyl is accumulated in a tank before it is processed. Therefore, the tank functions to store waste and will need to be labeled as to content. The facility should also keep accurate records regarding how much waste Tectyl is treated. Drums used to collect drippage from the overhead conveyor should also be labeled.
- 3) Two samples were previously taken on waste Tectyl which indicated that the waste was hazardous for ignitability (D001). One of these samples was for Tectyl which was contaminated with other wastes. The other was done on reclaimed Tectyl. Because the facility has installed a new system and is currently treating this waste onsite, a new hazardous waste determination should be done to see if the waste should still be considered hazardous. If the waste Tectyl currently stored is not contaminated with other wastes and exhibits a flashpoint higher than 140 degrees, it could be removed from hazardous waste status and considered a residual waste.

A new residual waste process was also installed. A centrifuge is now used to periodically process the quench tank sludge. The centrifuged oil is returned to the quench tank and the centrifuged solids (scale) are mixed in a fixed proportion (7:1) with dry scale and sent to Riverside Scrap for reuse as scrap metal.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) _____

Date _____

Inspector (signature) _____

Date _____

INSPECTION REPORT COMMENTS

Date of Inspection _____ Identification Number _____

Company/Facility/Site Name Henry Miller Spring

The Biennial Report was completed by March, 1995 and Mr. Surmacy is forwarding a copy for review. As he is currently working on source reduction plans for several wastestreams, the source reduction strategies are in progress but not yet complete.

The facility is making strong progress toward compliance and are encouraged to continue. Any questions or concerns regarding this report may be addressed to me at (412) 442-5802.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) Sent Date _____

Inspector (signature) Judy Neulan Date 3/29/95

Page ____ of ____

Please refer to the instructions for Filing Notification before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).



Notification of Regulated Waste Activity

United States Environmental Protection Agency

PA/DG REGION 8
(For Official Use Only)

MAR 6 1995

I. Installation's EPA ID Number (Mark 'X' in the appropriate box)

☐

A. First Notification

☒

B. Subsequent Notification
(complete item C)

C. Installation's EPA ID Number

P A D 9 8 7 2 8 9 2 3 8

II. Name of Installation (Include company and specific site name)

H E N R Y M I L L E R S P R I N G & M F G. C O.

III. Location of Installation (Physical address not P.O. Box or Route Number)

Street

A L I S T R E E T

Street (continued)

City or Town

S H A R P S B U R G

State

ZIP Code

P A 1 5 2 1 5 -

County Code County Name

A L L E G H E N Y

IV. Installation Mailing Address (See Instructions)

Street or P.O. Box

P O B O X 7 8 2 6

City or Town

S H A R P S B U R G

State

ZIP Code

P A 1 5 2 1 5 -

V. Installation Contact (Person to be contacted regarding waste activities at site)

Name (last)

S U R M A C Y

(first)

J O S E P H

Job Title

M A I N T S U P E R.

Phone Number (area code and number)

4 1 2 - 7 8 2 - 0 7 0 0

VI. Installation Contact Address (See Instructions)

A. Contact Address Location Mailing

☒

B. Street or P.O. Box

S A M E

City or Town

State

ZIP Code

VII. Ownership (See Instructions)

A. Name of Installation's Legal Owner

H E N R Y M I L L E R S P R I N G & M F G. C O.

Street, P.O. Box, or Route Number

A L I S T R E E T

City or Town

S H A R P S B U R G

State

ZIP Code

P A 1 5 2 1 5 -

Phone Number (area code and number)

- - - - -

B. Land Type

☐

C. Owner Type

☐

D. Change of Owner Indicator

☐
☐

(Date Changed) Month Day Year

- - - - -

ID - For Official Use Only

VIII. Type of Regulated Waste Activity (Mark 'X' in the appropriate boxes. Refer to Instructions.)

A. Hazardous Waste Activity

B. Used Oil Fuel Activities

1. Generator (See Instructions)
- ☐ a. Greater than 1000kg/mo (2,200 lbs.)
- ☒ b. 100 to 1000 kg/mo (220 - 2,200 lbs.)
- ☐ c. Less than 100 kg/mo (220 lbs.)
2. Transporter (Indicate Mode in boxes 1-5 below)
- ☐ a. For own waste only
- ☐ b. For commercial purposes
- Mode of Transportation
- ☐ 1. Air
- ☐ 2. Rail
- ☐ 3. Highway
- ☐ 4. Water
- ☐ 5. Other - specify
- ☐ 3. Treater, Storer, Disposer (at Installation) Note: A permit is required for this activity; see instructions.
4. Hazardous Waste Fuel
- ☐ a. Generator Marketing to Burner
- ☐ b. Other Marketers
- ☐ c. Boiler and/or Industrial Furnace
- ☐ 1. Smelter Refractor
- ☐ 2. Small Quantity Exemption
- Indicate Type of Combustion Device(s)
- ☐ 1. Utility Boiler
- ☐ 2. Industrial Boiler
- ☐ 3. Industrial Furnace
- ☐ 5. Underground Injection Control

1. Off-Specification Used Oil Fuel
- ☐ a. Generator Marketing to Burner
- ☐ b. Other Marketer
- ☐ c. Burner - Indicate device(s) - Type of Combustion Device
- ☐ 1. Utility Boiler
- ☐ 2. Industrial Boiler
- ☐ 3. Industrial Furnace
- ☐ 2. Specification Used Oil Fuel Marketer (or On-site Burner) Who First Claims the Oil Meets the Specification

IX. Description of Regulated Wastes (Use additional sheets if necessary)

A. Characteristics of Nonlisted Hazardous Wastes. Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles. (See 40 CFR Parts 261.20 - 261.24)

1. Ignitable (D001)
2. Corrosive (D002)
3. Reactive (D003)
4. Toxicity Characteristic (D000)

(List specific EPA hazardous waste number(s) for the Toxicity characteristic contaminant(s))

B. Listed Hazardous Wastes. (See 40 CFR 261.31 - 33. See instructions if you need to list more than 12 waste codes.)

1 D001	2	3	4	5	6
7	8	9	10	11	12

C. Other Wastes. (State or other wastes requiring a handler to have an I.D. number. See Instructions.)

1	2	3	4	5	6
---	---	---	---	---	---

X. Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature: Joseph Surmacy Name and Official Title (type or print): JOSEPH-SURMACY Date Signed: 2-28-95

XI. Comments

MAJOR CLEAN UP OF TECTY WAS COMPLETED 12/14/94
RECORDS SHOW HENRY MILLER SPRING "NOW" SMALL QUANTITY GEN.

Note: Mail completed form to the appropriate EPA Regional or State Office. (See Section III of the booklet for addresses.)

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RECEIVED
PA/DC SECTION
FEB 13 1995
JAN 30 1995

Please refer to the instructions for Filing Notification before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).



Notification of Regulated Waste Activity

United States Environmental Protection Agency

I. Installation's EPA ID Number (Mark 'X' in the appropriate box)

☐ A. First Notification ☒ B. Subsequent Notification (complete item C)

C. Installation's EPA ID Number

P A D 9 8 7 2 8 9 2 3 8

II. Name of Installation (Include company and specific site name)

H E N R Y M I L L E R S P R I N G & M F G. C O.

III. Location of Installation (Physical address not P.O. Box or Route Number)

Street

A L I S T R E E T

Street (continued)

City or Town

S H A R P S B U R G

State

ZIP Code

P A 1 5 2 1 5 -

County Code County Name

A L L E G H E N Y

IV. Installation Mailing Address (See instructions)

Street or P.O. Box

P O B O X 7 8 2 6

City or Town

S H A R P S B U R G

State

ZIP Code

P A 1 5 2 1 5 -

V. Installation Contact (Person to be contacted regarding waste activities at site)

Name (last)

S U R M A C Y

(first)

J O S E P H

Job Title

M A I N T. S U P E R V I S O R

Phone Number (area code and number)

4 1 2 - 7 8 2 - 0 7 0 0

VI. Installation Contact Address (See instructions)

A. Contact Address Location Mailing

☒

B. Street or P.O. Box

S A M E

City or Town

A L I S T R E E T

State

ZIP Code

P A 1 5 2 1 5 -

VII. Ownership (See instructions)

A. Name of Installation's Legal Owner

H E N R Y M I L L E R S P R I N G & M F G. C O.

Street, P.O. Box, or Route Number

A L I S T R E E T

City or Town

S H A R P S B U R G

State

ZIP Code

P A 1 5 2 1 5 -

Phone Number (area code and number)

- - - - -

B. Land Type

P

C. Owner Type

P

D. Change of Owner Indicator

Yes

No

(Date Changed)

Month Day Year

- - - - -

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RECEIVED
SECTION
MAY 10 1964

ID - For Official Use Only							

VIII. Type of Regulated Waste Activity (Mark 'X' in the appropriate boxes. Refer to Instructions.)

A. Hazardous Waste Activity	B. Used Oil Fuel Activities
-----------------------------	-----------------------------

B. Used Oil Fuel Activities

- DX. Description of Regulated Wastes (Use additional sheets if necessary)

A. Characteristics of Nonlisted Hazardous Wastes. Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles. (See 40 CFR Parts 261.20 - 261.24)

- B. Listed Hazardous Wastes. (See 40 CFR 261.31 - 33. See instructions if you need to list more than 12 waste codes.)

1	2	3	4	5	6
0 0 0 1					
7	8	9	10	11	12

C. Other Wastes. (State or other wastes requiring a handler to have an I.D. number. See instructions.)

[illegible]

X. Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature <i>Joseph Surmacy</i>	Name and Official Title (type or print) Joseph SURMACY MAINT Supe.	Date Signed 1/24/95
------------------------------------	---	------------------------

XI. Comments

One Time Cleanup, Henry Miller Co. DC SECTION 1095
A Small Quantity Generator Second Quarter 1995

Note: Mail completed form to the appropriate EPA Regional or State Office. (See Section III of the booklet for addresses.)



Henry Miller SPRING AND MANUFACTURING COMPANY

P. O. BOX 7826 • SHARPSBURG • PITTSBURGH, PA. 15215-0826

Railroad and Industrial Coil Springs

AREA CODE 412

782-0700

FAX NO. 412-782-1646

FEBRUARY 7, 1995

U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION III
841 CHESTNUT BLDG.
MAIL CODE 3HW51
PHILADELPHIA, PA 19107-4431

RECEIVED
PA/DC SECTION

FEB 13 1995

SUBJECT: INFORMATION REGARDING CORRECT ADDRESS OF HENRY
MILLER SPRING AND MANUFACTURING COMPANY.

EPA REGION III

TO WHOM IT MAY CONCERN:

DUE TO MISCOMMUNICATION WITHIN OUR ORGANIZATION, AN
"EPA NOTIFICATION OF REGULATED WASTE ACTIVITY"
(EPA FORM 8700-12 REV. 9-92) DATED 9/7/94 WAS MAILED TO YOUR
ORGANIZATION WHICH STATED OUR ADDRESS INCORRECTLY.

PLEASE NOTE THAT OUR CORRECTED ADDRESS IS "ALI STREET" AND
NOT " 500 ALI STREET" AS PER THE REVISED FORM MAILED AND
DATED 1/26/95.

IF YOU HAVE ANY QUESTIONS, PLEASE CALL ME.

SINCERELY,

JOSEPH J. SURMACY
MAINTENANCE SUPERINTENDENT

SUBSCRIBED AND SWORN TO

FEB 7th DAY OF FEB 1995

RAYMOND C. CASPER, District Justice
Magisterial District 05-2-04
My Commission Expires on the First
Monday in January, 1998

Please refer to the Instructions for Filling Notification before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).



EPA

Notification of Regulated Waste Activity

United States Environmental Protection Agency

Date Received (For Official Use Only)

SEP 12 1994

I. Installation's EPA ID Number (Mark 'X' in the appropriate box)

☒

A. First Notification

☐

B. Subsequent Notification (complete item C)

C. Installation's EPA ID Number

PA D987289238

II. Name of Installation (Include company and specific site name)

HENRY MILLER SPRING & MFG. CO.

III. Location of Installation (Physical address not P.O. Box or Route Number)

Street

ALISTREET BOX 7826

Street (continued)

City or Town

SHARPSBURG

State

PA

ZIP Code

15215-7826

County Code

003

County Name

ALLEGHANY

IV. Installation Mailing Address (See Instructions)

Street or P.O. Box

P O BOX 7826

City or Town

SHARPSBURG

State

PA

ZIP Code

15215-7826

V. Installation Contact (Person to be contacted regarding waste activities at site)

Name (last)

SURMACY

(first)

JOSEPH

Job Title

MAINTENANCE SUPERVISOR

Phone Number (area code and number)

412-782-0700

VI. Installation Contact Address (See Instructions)

A. Contact Address Location Mailing

☒

B. Street or P.O. Box

SAME

City or Town

SHARPSBURG

State

PA

ZIP Code

15215-

VII. Ownership (See Instructions)

A. Name of Installation's Legal Owner

HENRY MILLER SPRING & MFG.

Street, P.O. Box, or Route Number

500 ALISTREET

City or Town

SHARPSBURG

State

PA

ZIP Code

15215-

Phone Number (area code and number)

412-782-0700

B. Land Type

P

C. Owner Type

P

D. Change of Owner Indicator

Yes

No

(Date Changed) Month Day Year

ID - For Official Use Only

VIII. Type of Regulated Waste Activity (Mark 'X' in the appropriate boxes. Refer to instructions.)

A. Hazardous Waste Activity		B. Used Oil Fuel Activities
1. Generator (See instructions) <input type="checkbox"/> a. Greater than 1000kg/mo (2,200 lbs.) <input checked="" type="checkbox"/> b. 100 to 1000 kg/mo (220 - 2,200 lbs.) <input type="checkbox"/> c. Less than 100 kg/mo (220 lbs.)	3. Treater, Storer, Disposer (at installation) Note: A permit is required for this activity; see instructions. <input type="checkbox"/> 4. Hazardous Waste Fuel <input type="checkbox"/> a. Generator Marketing to Burner <input type="checkbox"/> b. Other Marketers <input type="checkbox"/> c. Burner - Indicate device(s) - Type of Combustion Device <input type="checkbox"/> 1. Utility Boiler <input type="checkbox"/> 2. Industrial Boiler <input type="checkbox"/> 3. Industrial Furnace <input type="checkbox"/> 5. Underground Injection Control	1. Off-Specification Used Oil Fuel <input type="checkbox"/> a. Generator Marketing to Burner <input type="checkbox"/> b. Other Marketer <input type="checkbox"/> c. Burner - Indicate device(s) - Type of Combustion Device <input type="checkbox"/> 1. Utility Boiler <input type="checkbox"/> 2. Industrial Boiler <input type="checkbox"/> 3. Industrial Furnace <input type="checkbox"/> 2. Specification Used Oil Fuel Marketer (or On-site Burner) Who First Claims the Oil Meets the Specification
2. Transporter (Indicate Mode in boxes 1-5 below) <input type="checkbox"/> a. For own waste only <input type="checkbox"/> b. For commercial purposes Mode of Transportation <input type="checkbox"/> 1. Air <input type="checkbox"/> 2. Rail <input type="checkbox"/> 3. Highway <input type="checkbox"/> 4. Water <input type="checkbox"/> 5. Other - specify _____		

IX. Description of Regulated Wastes (Use additional sheets if necessary)

A. Characteristics of Nonlisted Hazardous Wastes. Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles. (See 40 CFR Parts 261.20 - 261.24)

1. Ignitable (D001)	2. Corrosive (D002)	3. Reactive (D003)	4. EP Toxic (D000)	(List specific EPA hazardous waste number(s) for the EP Toxic contaminant(s))
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

B. Listed Hazardous Wastes. (See 40 CFR 261.31 - 33. See instructions if you need to list more than 12 waste codes.)

1	2	3	4	5	6
F 0 0 3	F 0 0 5				
7	8	9	10	11	12

C. Other Wastes. (State or other wastes requiring an LD number. See instructions.)

1	2	3	4	5	6

X. Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment.

Signature	Name and Official Title (type or print)	Date Signed
Joseph J. Surmacy	Joseph J. Surmacy Maint. Super.	9-7-94

XI. Comments

A WHOLLY OWNED SUBSIDIARY OF FINANCE ENTERPRISES.

865 Busse Highway

PARK Ridge ILLINOIS 60068

RR. 9/23/94
HST 9-23-94

Note: Mail completed form to the appropriate EPA Regional or State Office. (See Section III of the booklet for addresses.)



ACKNOWLEDGEMENT OF NOTIFICATION
OF REGULATED WASTE ACTIVITY
(VERIFICATION)

This is to acknowledge that you have filed a Notification of Regulated Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

PAD987289238

09/27/94

INSTALLATION ADDRESS

HENRY MILLER SPRING & MFG CO
PO BOX 7826
SHARPSBURG PA 152157826
JOSEPH SURMACEY MAIN SUPV

ALIST ST BOX 7826
SHARPSBURG PA 152157826